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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Preparation for International) ET Docket No. 93-198
Telecommunication Union World)
Radio Communication Conferences)

REPLY COMMENTS
OF
dbX CORPORATION

dbX Corporation ("dbX"), by its attorneys, hereby submits its reply comments in the above-captioned proceeding. In the Notice of Inquiry in this docket, the Commission sought comments relating to telecommunications issues to be addressed at future World Radiocommunication Conference ("WRC") meetings. By these reply comments dbX supports the position of ORBCOMM and STARSYS that the U.S. should propose at WRC-93 that the agenda for WRC-95 contain an item seeking additional allocations for the non-voice, non-geostationary mobile satellite services below 1 GHz ("NVNG MSS").

dbX has filed comments and reply comments in the FCC's rulemaking proceedings in CC Docket 92-76 relating to the establishment of rules for the NVNG MSS.¹ In those comments, dbX explained that it has been actively pursuing opportunities in newly emerging areas of mobile communications in the United States for well over two decades and that it has concluded that there is likely to be robust demand for new mobile communication

¹ Amendment of the Commission's Rules to Establish Rules and Policies Pertaining to a Non-Voice Non-Geostationary Mobile-Satellite Service, CC Docket No. 92-76, (FCC 93-28), released February 10, 1993.

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services, such as the NVNG MSS. Although dbX has not filed an application to operate a NVNG MSS system, it has remained keenly interested in the introduction of low earth orbit satellite services and anticipates that it will be actively in the NVNG MSS as a purchaser of channels, a reseller or in some other capacity to be determined in the future. Given this background, dbX has a

"open issues for nongeostationary MSS services that are to be addressed pursuant to Resolutions 46 and 70."² In particular, dbX believes that the WRC should insure that there is a practical

CERTIFICATE OF SERVICE

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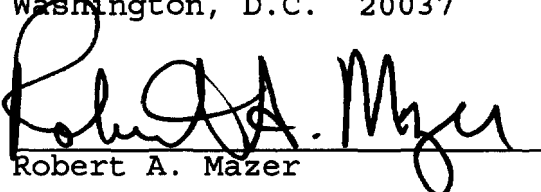
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